

January 15, 2019

Reference No. 075398

Jalal El-Jayyousi, P.E. MDNR – Hazardous Waste Program 1730 Elm Street PO Box 176 Jefferson City, MO 65102-0176

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Dear Mr. El-Jayyousi:

Re: Sedalia, MO – Former MP Shops

2018 Second Semi-Annual Progress Report

Docket No. RCRA-07-2004-0034

This letter presents the 2018 Second Semi-Annual Progress Report of activities completed for the Union Pacific Railroad (UPRR) Sedalia Facility pursuant to the Administrative Order on Consent between UPRR and the United States Environmental Protection Agency (USEPA) effective on March 4, 2004. The period for this report is July through December 2018.

1. Work Performed

The following work was performed during this reporting period:

- 1. The 2018 First Semi-Annual RS-1 recovery system sampling results were submitted to the City of Sedalia and Missouri Department of Natural Resources (MDNR) in a report dated July 24, 2018.
- 2. The 2018 First Semi-Annual Progress Report was submitted to MDNR on July 24, 2018.
- 3. The 2018 First Semi-Annual RS-1 Discharge Report was submitted to the City of Sedalia on July 24, 2018.
- 4. A subcontractor, Roberts Environmental Drilling (REDI) performed well repairs on October 1-2, 2018. Monitoring well MW-23A was abandoned and replaced with a new well. Other well repairs include concrete well pad replacements and casing extensions for some of the wells.
- 5. The RS-1 recovery system was sampled on December 11, 2018, in accordance with the March 19, 2009 letter from the City of Sedalia.
 - VOC concentrations from this sampling event were added to determine a TTO discharge concentration of 0.0530 mg/L, which is well below the City of Sedalia's discharge limit of 2.13 mg/L

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2. Project Work for the Next Reporting Period

The following work is anticipated to be performed during the next reporting period.

- 1. The Annual Environmental Covenant Compliance Report will be submitted to MDNR in January 2019.
- 2. The semi-annual discharge monitoring report will be submitted to the City in January 2019.
- 3. The 2018 Annual Groundwater Monitoring Report will be submitted to MDNR and USEPA in February 2019.
- 4. A site-wide asbestos containing material (ACM) inspection and abatement will be conducted in March or April 2019. The ACM Inspection and Abatement Report will be prepared for submittal in June or July 2019.
- 5. The 2019 annual groundwater monitoring event will be performed in April 2019. A summary of the results will be provided in the next progress report.
- 6. The annual inspection of the consolidation area vegetative cover will be performed in April 2019. Based on observations during this inspection, moving and brush removal of the consolidation area will be conducted, if necessary.
- 7. The RS-1 recovery system will be sampled in June 2019, and a semi-annual report will be submitted to the City.

Please contact me at (402) 778-4801 or robyn.hansen@ghd.com if you have any questions or comments.

Sincerely,

GHD

Robyn Hansen

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RH/rm/7

cc: Laura Pollack (Union Pacific Railroad)
Robert Aston, U.S. EPA (1 copy; RCRA Docket No. VII-90-H-0024)